

PUBLIC SUBMISSION

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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0469

Comment submitted by Bruce Richardson, President, Association of Virginia Potato and Vegetable Growers

Submitter Information

Submitter's Representative: Bruce Richardson, President

Organization: Association of Virginia Potato and Vegetable Growers

General Comment

The farmer members of our Association are committed to do their part to clean up the Chesapeake Bay. Virginia farmers have a proud history of implementing conservation tillage and BMPs to mitigate the effect of runoff into Bay. Unfortunately, the model used to both assess the problem and perscribe the soloution is seriously flawed. The model only counts the acres that are cost shared under USDA cost share programs. That is only a small percentage of the amount of conservation tillage and BMPs that Virginia farmers have implemented over the years. Numerous professionals, including members of our Association, estimate that the current model understates the actual number acres in conservation tillage and BMPs by over 50%!

The TMDL process is going to be an extremely expensive process for both the government and our farmers. We need to be sure that both the farmer's and the taxpayer's money are well spent.

We feel strongly that regulating agriculture using the existing model is unfair and unwise. We urge you to work with the Agricultural community to correct the model before implementing regulations that will force some of our members out of business. We will be happy to work with anyone to correct the flaw(s) in the model. Please don't hesitate to call on us if we may be of assistance in this matter.

Sincerely,

Bruce Richardson, President